NORTH CAROLINA DIVISION OF AIR QUALITY

Application Review

Issue Date: DRAFT

Region: Washington Regional Office
County: Wayne
NC Facility ID: 9600058
Inspector's Name: Robert Bright
Date of Last Inspection: 06/06/2019
Compliance Code: 3 / Compliance - inspection

Facility Data

Applicant (Facility's Name): Georgia-Pacific Wood Products LLC - Dudley Plywood/CNS Plant

Facility Address:
Georgia-Pacific Wood Products LLC - Dudley Plywood/CNS Plant
139 Brewington Road
Dudley, NC 28333

SIC: 2436 / Softwood Veneer And Plywood
NAICS: 321212 / Softwood Veneer and Plywood Manufacturing

Facility Classification: Before: Title V **After:** Title V
Fee Classification: Before: Title V **After:** Title V

Permit Applicability (this application only)

SIP: 15A NCAC 02Q .0513 "Permit Renewal and Expiration"
NSPS: N/A
NESHAP: N/A
PSD: N/A
PSD Avoidance: N/A
NC Toxics: N/A
112(r): N/A
Other: N/A

Contact Data

Facility Contact	Authorized Contact	Technical Contact
Brandy Turley Complex Environmental Manager (919) 705-0526 139 Brewington Road Dudley, NC 28333	Michael Golden Plywood Plant Manager (919) 736-4385 139 Brewington Road Dudley, NC 28333	Brandy Turley Complex Environmental Manager (919) 705-0526 139 Brewington Road Dudley, NC 28333

Application Data

Application Number: 9600058.19A
Date Received: 03/27/2019
Application Type: Renewal
Application Schedule: TV-Renewal

Existing Permit Data
Existing Permit Number: 09268/T25
Existing Permit Issue Date: 01/29/2019
Existing Permit Expiration Date: 09/30/2019

Total Actual emissions in TONS/YEAR:

CY	SO2	NOX	VOC	CO	PM10	Total HAP	Largest HAP
2018	7.19	136.49	432.92	238.80	131.65	49.22	30.74 [Methanol (methyl alcohol)]
2017	22.75	168.02	542.52	699.20	152.02	70.50	33.81 [Methanol (methyl alcohol)]
2016	21.48	159.91	503.19	662.22	142.46	65.54	31.19 [Methanol (methyl alcohol)]
2014	32.08	340.64	327.34	795.15	265.78	39.74	22.23 [Methanol (methyl alcohol)]

Review Engineer: Kevin Godwin

Review Engineer's Signature: **Date:**

Comments / Recommendations:
Issue 09268/T26
Permit Issue Date:
Permit Expiration Date:

I. Purpose of Application

Georgia-Pacific Wood Products, LLC - Dudley Plywood/CNS Plant currently holds Title V Permit No. 09268T25 with an expiration date of September 30, 2019 for a plywood and dimensional lumber manufacturing facility in Dudley, Wayne County, North Carolina. Air Permit Application No. 9600058.19A for permit renewal was received on March 27, 2019, or at least six months prior to the expiration date, as required by General Permit Condition 3.K. Therefore, the existing permit shall not expire until the renewal permit has been issued or denied. All terms and conditions of the existing permit shall remain in effect until the renewal permit has been issued or denied. This application will go through a 30-day public comment period and a 45-day EPA review at this time.

II. Facility Description

Detailed facility-wide flow diagrams for the Plywood Plant and the CNS Plant are included in the renewal application.

A. Plywood Plant

The Dudley Plywood Plant manufactures plywood from softwood and soft hardwood logs. According to the renewal application, the process operates as follows:

Logs are sent to the No. 1 Swing Saw (IF-SES1) where they are cut to appropriate length. Logs are then sent to the Ring De-barker (F-DBPW) to remove bark followed by the Slasher Saw (IF-SS) or the Deck Saws (F-DSPW) to cut logs to size. Bark generated in the debarking operation is sent to Bark Hogs (IF-BH) where it is sized before being conveyed to the Wood-fired Boiler (ES-B1). The Bark Hogs also size purchased bark.

The trimmed off ends of logs (lilypads) are sent to a Chipper (IF-LPC) where they are chipped for use as fuel in the boiler. Chips are also generated from the Veneer Chippers (IF-VC1 and VC2) which process the trimmed-off ends of the veneer sheets from the rotary clippers and Fishtail Saw (IF-FS) and low quality veneer. The chips from the Veneer Chippers are sent to No. 1 and No. 2 Chip Surge Bins and the screened by Shaker Screens (IF-SHS1 and SHS2). The oversize chips are sent to Bark Hogs. The chips from the Shaker Screens are pneumatically transferred to the green Chip Truck Bin/Railcar loading (IF-TR) via Cyclone CD-C5 or to the green Chip Truck Bin (IF-TB1) via Cyclone CD-C17 for shipment off-site.

After the Slasher and Deck Saws, logs are sent to log vats (F-LSV) for heating prior to the veneer peeling process. Ply-blocks are converted to veneer by lathes. A ply-block core remains after the plywood is peeled. These cores are sent to the Dudley CNS facility to be processed into lumber. The lathes peel the logs into thin sheets of green veneer, which are then clipped to desired widths by the rotary clippers. The veneer trimmings are sent to Veneer Chippers. If the clipped green veneer is of high quality, it proceeds directly to the four Veneer Dryers (ES-VD1 through VD4). The lower quality veneer is cut into smaller strips, stacked, and sent to dryers.

The Veneer Dryers are heated indirectly using steam from the wood-fired boiler. Exhaust from the “hot section” of the dryers is routed to a natural gas-fired Regenerative Thermal Oxidizer (CD-VD). “Cool section” emissions are a small fraction of the total emissions and are not routed to the RTO. The dried veneer is graded, sorted, and processed.

The dried veneer is then sent to the Glue Line (F-GL) where resin (glue) is applied to the veneer sheets before core strips are applied. The veneer is applied in layers, with glue being applied after each subsequent layer of veneer is added. This process is repeated until the desired thickness is achieved. A flying saw then makes a cut in the layered-up veneer. The wood residuals are transferred to the residuals hog and this material is pneumatically transferred to the plywood pressing, sawing, and trimming conveying system (ES-CS3) via Cyclone CD-C1.

The unpressed plywood panel then proceeds to the cold pre-presses and presses (F-VP1 and VP2). In the presses, the combination of heat and pressure cures the glue and form the plywood panel. After the presses, the panels are trimmed and the trimmed material is hogged in the dry residuals hog and this material is pneumatically transferred to the plywood pressing, sawing, and trimming conveying transfer system (ES-CS3) via Cyclone CD-C1. The emissions from the dry wood residual transfer system are controlled by a Bagfilter (CD-BH1).

The wood residuals from Cyclone CD-C1 are conveyed by the dry wood residual transfer system (ES-CS4) via Cyclone CD-C8 to be used as boiler fuel or to the Plytrim truck bin (IF-TB2) for shipment off-site or as a fuel source. Emissions from the dry wood transfer system are controlled by a Bagfilter (CS-BH8).

Sawed panels then proceed to the Patch line (F-PP), the Tongue & Groove Sander (ES-TGS), the Specialty Saw, the Big Four Head Sander (ES-BS), or the strapper and manual feed for being packaged for shipment off-site. Emissions from the T&G Sander and the Big Sander are controlled by a Bagfilter (CD-BH5). The sanderdust

generated at the sanders is conveyed via Cyclone (CD-C3) and Cyclone (CD-C4) respectively to the dry fuel metering bin for use a fuel in the boiler. The sanderdust generated by the Specialty Saw is collected in plywood pressing, sawing, and trimming conveying system (ES-CS3) via Cyclone CD-C1.

From the finishing operations, some of the plywood panels may be sent for edge sealing or for form oil application. Finished bundles of panels are stenciled with logo and end stripping.

Boiler (ES-B1) is rated at 254 million Btu per hour heat input and fires purchased bark and wood residuals from the plywood and lumber production processes. The boiler fires a small amount of No. 2 fuel oil as a start-up fuel. The boiler exhausts to a multicyclone (CD-MC), followed by a venturi scrubber (CD-SC). Ash generated from combustion is shipped off-site. The boiler provides steam for the log vats, veneer dryers, presses, and glue mixing area.

The Dudley Plywood Plant operates a diesel-fired Emergency Fire Pump Engine (ES-P3).

B. CNS Plant

Logs are processed in a similar fashion here as at the Plywood Plant. Once processed by the Sawmill, the lumber continues to the sorter where it is mechanically sorted by length and width prior to being transported to the green lumber storage yard to await drying in the lumber kilns.

Rough lumber is stacked and dried in one of three lumber drying kilns (ES-LK1, LK2, and LK3). Kiln LK1 is a direct-heated batch kiln equipped with a 28 million Btu/hour sawdust gasifier burner. Kilns LK2 and LK3 are direct-heated continuous lumber drying kilns equipped with a 28 and 38 million Btu/hour sawdust gasifier burner, respectively. The CNS facility uses No. 2 fuel oil as a start-up for the kilns. Once dried, the lumber is cooled prior to planing.

Dried lumber is planed and trimmed in the planer mill. The dried, rough cut lumber is passed through the planer mill to reduce the surface roughness of the finished product. The lumber is then cut to size by various saws. Trimmings are mechanically conveyed to the planer hog. Residuals from the planer hog and the planer machine are pneumatically conveyed to the Planer Mill Conveying System (ES-PMCS) and the Planer Shavings Conveying System (ES-PSCS) and Planer Shavings Bin (IF-PSB) via Cyclone CD-C44A where they are collected for storage prior to being shipped off-site. Emissions from the Planer Mill Conveying System (ES-PMCS) are controlled by Cyclone (CD-C43).

In addition to the main production activities, there are a number of activities that support the main operation. These include storage tanks for resins and oils, and facility roads.

III. History/Background/Application Chronology

Permit History since Last TV Permit Renewal

July 2, 2015	Permit No. 09268T19 was issued as a Significant Modification. Under this Permit, a Part II Significant Modification application (.14D) was consolidated with a Significant Modification application (.15A). The Significant Modification involved amending an existing PSD avoidance condition (2.1 B.4.).
September 14, 2015	Permit No. 09268T20 was issued as a Minor Modification for the addition of a new veneer conditioning chamber (ID No. IF-VCC).
August 1, 2016	Permit No. 09268T21 was issued as Part I of a Significant Modification for the following projects/requests: 1. rebuild Veneer Dryer #2 (ES-VD2), 2. reskin Veneer Dryer #3 (ES-VD3), 3. replace Veneer Dryer #1 and #4 (ES-VD1 and ES-VD4) coils and steam traps, 4. install new programmable logic controller (PLC) for the presses, 5. upgrade lathes (IF-LA), 6. add a Veneer Conditioning Chamber (IF-VCC), 7. modify the stream distribution system to utilize flash steam to heat the log vats, 8. modify existing language in Section 2.2 C.1.e.i.(C) to more accurately reflect the language in the Plywood and Composite Wood Products (PCWP) MACT (40 CFR 63 Subpart DDDD), recording the

	average of the firebox temperatures instead of each individual chamber in the regenerative thermal oxidizer (RTO)(ID No. CD-VD), and 9. use results from the January 2010 PCWP MACT compliance test to establish minimum firebox temperature rather than the January 14, 2014 PSD avoidance compliance test.
January 1, 2016	Permit No. 09268T22 was issued as a Minor Modification for the following projects: 1. replace existing diesel-fired emergency water pump (170 horsepower, ID No. ES-P1) with a new diesel-fired fire water pump (174 horsepower, ID No. ES-P3), and 2. remove the existing little chipper (ID No. ES-LC) equipped with transfer cyclone (ID No. CD-45) and associated conveying system and route material to the existing big chipper (ID No. ES-BC) via a new trim conveying system (ID No. ES-TC) having three drop points.
November 11, 2017	Permit No. 09268T23 was issued as a One Step Significant Modification for the replacement of existing cyclone (ID No. CD-C3) and bagfilter (ID No. CD-BH3) installed on the tongue and groove sander (ID No. ES-TGS) and existing cyclone (ID No. CD-C4) and bagfilter (ID No. CD-BH4) installed on the big sander (ID No. ES-BS) with a new bagfilter (9,679 square feet of filter area, ID No. CD-BH5).
April 9, 2018	Permit No. 09268T24 was issued as Part II of Significant Modification for the August 1, 2016 Part I Permit.
January 1, 2019	Permit No. 09268T25 was issued as a Part I Significant Modification for installation of Advanced Process Controls (APCs) on the Veneer Dryers and Boiler. The APC is a computer software package that optimizes operational decision making.
June 21, 2019	Air Permit Application No. 9600058.18A was received for a Minor Modification for the replacement of existing bagfilter (CD-BH43) with a high efficiency cyclone (CD-43) on the planer mill system (ES-PMCS). According to the application, the cyclone is more efficient than the existing bagfilter and will require less maintenance. In addition, the cyclone will reduce potential hazards from combustible dust.
July 13, 2019	Air Permit Application 9600058.18B was received for a Minor Modification for the replacement of the existing boiler scrubber system with a new boiler scrubber system. The new system will allow the facility to more reliably control and monitor the scrubber pressure drop and liquid flow rate as required by 40 CFR 63, Subpart DDDDD for boiler (ID No. ES-B1). According to the application, the new venturi scrubber system will provide the same or better removal efficiency as the previous venturi scrubber system. Application .18A was consolidated with .18B.
October 24, 2019	An Air Permit Application was received as an update to the June 21, 2019 application. The application included updated specifications for the cyclone (CD-43) based on final construction bid packages.

Application .18B is consolidated into this renewal application.

<u>Application Chronology</u>

Received renewal application	March 27, 2019
Draft sent to Supervisor	December 12, 2019
Draft provided to the applicant and Regional Office	December 17, 2019
DRAFT Permit to Public Notice and EPA	XX
Final Permit Issued	XX

IV. Permit Modifications/Changes

The following table provides a summary of changes made to the existing permit.

Page No.	Condition/ Item	Description of Change(s)
Throughout	NA	Change the application number and complete date; Change permit revision number to T26; Change the permit issuance/effective dates; Change word "assure" to "ensure" except in General Conditions.
Cover letter	NA	Updated PSD increment tracking paragraph.
Insignificant Activities List	NA	Updated the list of insignificant activities as outlined in the renewal application.
3	Table of Permitted Emission Sources	Updated the list of Permitted Equipment as outlined in the renewal application as follows: <u>Plywood Plant</u> Glue line (F-GL) source description is modified to Glue Line Spreader, Log soaking vats Emission Source ID is revised to ES-LSV, <u>CNS Plant</u> One residuals direct-fired **Batch** lumber kiln (**28.0** million Btu/hour, potential operating rate of 56.94 million board feet per year)(ES-**LK1**), One residuals direct-fired double track continuous lumber kiln (**28.0** million Btu/hour, potential operating rate of 73 million board feet per year)(**ES-LK2**), One residuals direct-fired double track continuous lumber kiln (**38.0** million Btu/hour, potential operating rate of 110 million board feet per year)(**ES-LK3**), CNS Debarker (F-DBCNS), **removed bagfilter (CD-BH48)**, One pneumatic sawdust conveying system (ES-SCS) with cyclones (CD-C42 or CD-C44S), **removed cyclone (CD-47)**, One planer mill conveying system (ES-PMCS) with cyclone (CD-43), **removed (CD-BH43, CD-C50, and CD-BH50)**, One planer mill shaving conveying system (ES-PSCS) with cyclone (CD-44A), **removed CD-C44B)**, Chip-N-Saw Line (ES-CNS)(maximum design capacity of **239,940 MBF/yr**, **removed (CD-BH49)**, Removed fire water pump engine (ES-P2), and Moved source (ES-TC) to insignificant activities list (IF-TC).
11	2.1 B.3.a.ii.	Clarified condition to indicated that the limit applies only to the Veneer Dryers "hot zones" controlled by the RTO (CD-VD).

Page No.	Condition/ Item	Description of Change(s)
21	2.1 E.	Removed Natural gas/propane burner for Boiler (ES-B1) as it was not installed. Removed 112j Case-by-Case MACT condition and replaced it with a condition pertaining to MACT Subpart DDDDD. Removed CAM requirements for the Boiler (ES-B1).
33	2.1 H.	Removed flat screen (ID No. F-FS) and placed it in the insignificant activity list (ID No. IF-FS). Updated condition by adding and removing the control devices referenced above.
38 (old page No.)	2.1 I.	Removed diesel-fired emergency water pump engine (ID No. ES-P2).
43	2.2 C.	Removed recordkeeping requirement under 15A NCAC 02D .0530(u) for sources associated with application No. 9600058.13B as records were required until January 31, 2018.

V. Regulatory Review

The following sources at the GP-Dudley facility are subject to the regulations identified below. The permit is updated to reflect the most current stipulations for all applicable regulations.

A. Plywood plant conveying, sawing, and trimming operations, including:

- One shaker screen 1 chip conveying system (ID No. ES-CS1) transporting green wood residuals to a chip truck bin (ID No. IF-TB1) via one associated simple cyclone (ID No. CD-C17);
- One shaker screen 2 chip conveying system (ID No. ES-CS2) transporting green wood residuals to either:
  - One chip truck bin (ID No. IF-TR) via one associated simple cyclone (ID No. CD-C5); or
  - Chip rail loading (ID No. IF-TR) via one associated simple cyclone (ID No. CD-C5A);
- Plywood pressing, sawing, and trimming conveying system (ID No. ES-CS3) transporting dry wood residuals to either:
  - One plywood trim truck bin (ID No. IF-TB2) via two associated simple cyclones (ID Nos. CD-C1 and CD-C8A, respectively) in series with one bagfilter (ID No. CD-BH1); or
  - Dry wood residuals transfer system ES-CS4
    Plywood pressing, sawing, trimming, and conveying transfer system (ID No. ES-CS4) transporting dry wood residuals to the boiler fuel house (ID No. IF-BFH) via one associated simple cyclone (ID No. CD-C8) in series with one bagfilter (ID No. CD-BH8)

1. 15A NCAC 02D .0512 "Particulates from Miscellaneous Wood Products Finishing Plants"
2. 15A NCAC 02D .0521 "Control of Visible Emissions"
3. 15A NCAC 02D .0530 "Prevention of Significant Deterioration"

No changes are being requested with this renewal application. Therefore, no changes are being made to the existing regulations.

B. Four steam-heated veneer dryers arranged in parallel (ID Nos. ES-VD1, ES-VD2, ES-VD3, and ES-VD4) and one associated four-chamber natural gas-fired regenerative thermal oxidizer (ID No. CD-VD)

1. 15A NCAC 02D .0512 "Particulates from Miscellaneous Wood Products Finishing Plants"
2. 15A NCAC 02D .0521 "Control of Visible Emissions"
3. 15A NCAC 02D .0530 "Prevention of Significant Deterioration"
4. 15A NCAC 02D .0530(u) "Use of Projected Actuals to Avoid Applicability of Requirements of PSD"
5. 15A NCAC 02D .1111 "Maximum Achievable Control Technology" [40 CFR Part 63, Subpart DDDD – Plywood and Composite Wood Products]
6. 15A NCAC 02D .1806 "Control of Odorous Emissions"
7. 15A NCAC 02Q .0317 "Avoidance Conditions" for Avoidance PSD

No changes are being requested with this renewal application. Therefore, no changes are being made to the existing regulations.

C. Two steam-heated plywood presses (ID Nos. F-VP1 and F-VP2)

1. 15A NCAC 02D .0512 "Particulates from Miscellaneous Wood Products Finishing Plants"
2. 15A NCAC 02D .0521 "Control of Visible Emissions"
3. 15A NCAC 02D .0530 "Prevention of Significant Deterioration"
4. 15A NCAC 02D .0530(u) "Use of Projected Actuals to Avoid Applicability of Requirements of PSD"
5. 15A NCAC 02D .1111 "Maximum Achievable Control Technology" [40 CFR Part 63, Subpart DDDD – Plywood and Composite Wood Products]
6. 15A NCAC 02D .1806 "Control of Odorous Emissions"

No changes are being requested with this renewal application. Therefore, no changes are being made to the existing regulations.

D. Sanding operations, including:

One tongue and groove sander (ID No. ES-TGS) with one bagfilter (ID No. CD-BH5); and
One plywood sanding operation (a.k.a. Big Sander) (ID No. ES-BS) with one bagfilter (ID No. CD-BH5)

1. 15A NCAC 02D .0512 "Particulates from Miscellaneous Wood Products Finishing Plants"
2. 15A NCAC 02D .0521 "Control of Visible Emissions"
3. 15A NCAC 02D .0530 "Prevention of Significant Deterioration"

No changes are being requested with this renewal application. Therefore, no changes are being made to the existing regulations.

E. Wood residual/bark-fired boiler (ID No. ES-B1) equipped with an overfire air (OFA) system, and one associated multicyclone (ID No. CD-MC) in series with one venturi scrubber (ID No. CD-SC)

1. 15A NCAC 02D .0504 "Particulates from Wood Burning Indirect Heat Exchangers"
2. 15A NCAC 02D .0516 "Sulfur Dioxide Emissions from Combustion Sources"
3. 15A NCAC 02D .0521 "Control of Visible Emissions"
4. 15A NCAC 02D .0530 "Prevention of Significant Deterioration"
5. 15A NCAC 02D .0530(u) "Use of Projected Actuals to Avoid Applicability of Requirements of PSD"
6. 15A NCAC 02D .1111 "Maximum Achievable Control Technology" [40 CFR Part 63, Subpart DDDDD – Industrial, Commercial, Institutional Boilers and Process Heaters]
7. 15A NCAC 02D .1806 "Control of Odorous Emissions"

No changes are being requested with this renewal application. Therefore, no changes are being made to the existing regulations with the exception of replacing the existing 112j Case-by-Case MACT condition with a MACT, Subpart DDDDD condition.

F. One Diesel-fired fire water pump engine (ID No. ES-PS3)

1. 15A NCAC 02D .0516 "Sulfur Dioxide Emissions from Combustion Sources"
2. 15A NCAC 02D .0521 "Control of Visible Emissions"
3. 15A NCAC 02D .0524 "New Source Performance Standards" [40 CFR Part 60 - Subpart IIII]
4. 15A NCAC 02D .1111 "Maximum Achievable Control Technology" [40 CFR Part 63 - Subpart ZZZZ]
5. 15A NCAC 02D .1806 "Control of Odorous Emissions"

No changes are being requested with this renewal application. Therefore, no changes are being made to the existing regulations.

G. Three wood residuals direct-fired lumber kilns (ID Nos. ES-LK1, LK2, and LK3)

1. 15A NCAC 02D .0515 "Particulates from Miscellaneous Industrial Processes"
2. 15A NCAC 02D .0516 "Sulfur Dioxide Emissions from Combustion Sources"
3. 15A NCAC 02D .0521 "Control of Visible Emissions"
4. 15A NCAC 02D .0530 "Prevention of Significant Deterioration"
5. 15A NCAC 02D .1111 "Maximum Achievable Control Technology" [40 CFR Part 63, Subpart DDDD – Plywood and Composite Wood Products]
6. 15A NCAC 02D .1806 "Control of Odorous Emissions"

No changes are being requested with this renewal application. Therefore, no changes are being made to the existing regulations.

H. Chip-N-Saw plant woodworking operations including:

- Big chipper (ID No. ES-BC) and one associated simple cyclone (ID No. CD-C46);
- Trim conveyance (ID No. ES-TC) to Big chipper;
- One pneumatic sawdust conveying system (ID No. ES-SCS) transporting dry wood residuals to either:
  - One of two lumber kiln fuel storage silo via one associated simple cyclone (ID No. CD-C44S); or
  - One sawdust bin (ID No. F-SWB) via one associated simple cyclone (ID No. CD-C42)
- One planer mill conveying system (ID No. ES-PMCS) and associated simple cyclone (ID No. CD-43);
- One planer shavings conveying system (ID No. ES-PSCS) and one associated simple cyclone (ID No. CD-C44A); and

  One Chip-N-Saw line (ID No. ES-CNS)

1. 15A NCAC 02D .0512 "Particulates from Miscellaneous Wood Products Finishing Plants"
2. 15A NCAC 02D .0521 "Control of Visible Emissions"

No changes are being requested with this renewal application. Therefore, no changes are being made to the existing regulations.

VI. Compliance Assurance Monitoring (CAM)

40 CFR Part 64 is applicable to any pollutant-specific emission unit, if the following three conditions are met:

- the unit is subject to any (non-exempt: e.g. pre November 15, 1990, Section 111 or Section 112 standard) emission limitation or standard for the applicable regulated pollutant,
- the unit uses any control device to achieve compliance with any such emission limitation or standard, and
- the unit's pre-control potential emission rate exceeds either 100 tpy (for criteria pollutants) or 10/25 tpy (for HAPs).

In the existing Permit, Specific Condition 2.1 E.6. includes CAM requirements for the wood-fired boiler (ID No. ES-B1). With this application, GP proposes to remove the condition. According to the application, the boiler will be subject to the Boiler MACT standards starting May 20, 2019. As described in 40 CFR 64.2(b)(i), CAM does not apply to any emission limitation or standard proposed by the EPA after November 15,1990 pursuant to Section 111 and 112 of the Clean Air Act. The Boiler MACT was proposed after this timeframe and controls the pollutants regulated by CAM. Therefore, CAM requirements are not included in the renewal permit.

GP operates an RTO on the Veneer Dryers. This control device is used to achieve compliance with the PCWP MACT. The PCWP MACT was proposed after 1990 under Section 112 of the Clean Air Act. Therefore, the RTO is not subject to CAM requirements.

GP operates a number of cyclones and bagfilters which are used for material recovery. According to the application, these cyclones and bagfilters are primarily for material transfer and byproduct recovery and are therefore inherent to the manufacturing process. Per 40 CFR 64.1, a control device is equipment other than inherent process equipment. Inherent process equipment is defined as equipment that is necessary for the proper or safe functioning of the process, or material recovery equipment that the owner or operator documents is installed and operated primarily for purposes other than compliance with air pollution regulations. As the primary purpose of the cyclones and bagfilters is material recovery, they qualify as inherent process equipment and CAM is not required.

VII. Facility Wide Air Toxics

In 2013, the General Assembly amended the State Air Toxics rules to provide an exemption for any source that is subject to any requirements under USEPA regulations that require sources to control emissions of toxic air pollutants (TAPs) through the use of Maximum Achievable Control Technologies (MACT) or Generally Available Control Technologies (GACT).

DAQ is required to review permit applications that result in a net increase in toxic air pollutants (TAPs) to ensure the emissions will not pose an unacceptable risk to human health. If DAQ finds that emissions from a facility will pose an unacceptable health risk, the facility must comply with State Air Toxics even if they fall within the exempt category. According to the application, all emission sources at the GP-Dudley facility are subject to a MACT standard. Therefore, the GP-Dudley facility is not subject to this regulation.

The modification in this application review (renewal) does not increase emission of any toxic air pollutants and therefore does not present an unsafe health risk to the community.

VIII. Facility Emissions Review

Potential emissions have not changed under the TV permit renewal. Actual emissions from GP - Dudley are reported in the header of this permit review.

IX. Compliance Status

During the most recent inspection, conducted on June 5 and 6, 2019 by Mr. Robert Bright of the WARO, the facility appeared to be in compliance with all applicable requirements. Additionally, a signed Title V Compliance Certification (Form E5) indicating that the facility was in compliance with all applicable requirements was included with the application for permit renewal.

The five-year compliance history is detailed in the inspection report as follows:

A NOD was issued on August 15, 2014 for the late submittal of the semi-annual summary report due July 30, 2014.

A NOD was issued on March 12, 2015 for not conducting the monthly external inspections required for November 2014 for the Chip-N-Saw control devices via Permit Specific Condition 2.1.H.1. The inspections were completed on December 3, 2014. Via conversations between Robert Bright of WaRO and Brandy, it was understood that the required inspections were performed during November 2014, but not documented.

A Notice of Violation (NOV) was issued to the facility on October 9, 2015 regarding a September 17, 2015 Startup, Shutdown and Malfunction (SSM) Deviation Notification where the three-hour average combustion temperature for chamber two of the regenerative thermal oxidizer (RTO) dropped below the permit-required minimum of 1,580ºF for three consecutive three-hour blocks (1500 – 2400 hours). A discussion between Mr. Brandon Grissom, Regional Environmental Manager and Mr. Robert Bright of this office indicated that trash impeded chamber two's performance and the RTO programmed interlock sensitivity resulted in the operation below the permitted minimum. The report itself states that "the actions taken were inconsistent with the facility's SSM plan." WaRO did not believe the total HAP destruction efficiency fell below the 90 percent minimum required by 40 CFR Part 63, Subpart DDDD during this incident.

Note: The NOV dated 10/9/15 was questioned by GP stating that the use of a rolling three-hour average in lieu of the three-hour block average is not required in DDDD. Per discussion with Brandy, the NOV will be to reflect the block averages, which increases the time of non-compliance to nine hours, instead of eight hours, forty-five minutes via three consecutive three-hour blocks. The NOV was received by WaRO the week of October 19, 2015. The revised NOV (kept the same date) was issued to the facility on November 9, 2015.

X. Public Notice/EPA and Affected State(s) Review

A notice of the DRAFT Title V Permit shall be made pursuant to 15A NCAC 02Q .0521. The notice will provide for a 30-day comment period, with an opportunity for a public hearing. Copies of the public notice shall be sent to persons on the Title V mailing list and EPA. Pursuant to 15A NCAC 02Q .0522, a copy of each permit application, each proposed permit and each final permit pursuant shall be provided to EPA. Also pursuant to 02Q .0522, a notice of the DRAFT Title V Permit shall be provided to each affected State at or before the time notice provided to the public under 02Q .0521 above.

XI. Other Regulatory Considerations

- A P.E. seal is NOT required for this application.
- A zoning consistency determination is NOT required for this application.
- A permit fee is not required for this application.
- According to the application, GP has determined that no chemicals are stored in a quantity above the 112r triggering threshold and thus is not subject to 112r requirements.
- The application was signed by Mr. Michael Golden, Plant Manager and Designated Responsible Official on March 25, 2019

XII. Recommendations

The permit renewal application for Georgia Pacific Wood Products, LLC – Dudley Plywood/CNS Plant in Dudley, Wayne County, NC has been reviewed by DAQ to determine compliance with all procedures and requirements. DAQ has determined that this facility is complying or will achieve compliance, as specified in the permit, with all requirements that are applicable to the affected sources. DAQ recommends XXXX of Air Permit No. 09268T26.